

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN  
DISASTER SITE LITIGATION

**21 MC102 (AKH)**

NOTICE TO PRODUCE DOCUMENTS  
PURSUANT TO FEDERAL RULE OF  
CIVIL PROCEDURE 34

To: 22 Cortland Street/Hillman Environmental Group, LLC.  
Ahmuty Demers & McManus  
c/o Salvatore J. Calabrese, Esq.  
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New York, NY 10038  
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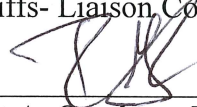
**PLEASE TAKE NOTICE**, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendant to respond within thirty (30) days to the following demands for document production with reference to 22 Cortlandt Street, as referenced in the deposition of Christopher Hillman, on April 30<sup>th</sup>, 2012, and on May 1<sup>st</sup>, 2012 at or about page as referenced below. To the extent records were already exchanged, please provide the bates numbers of the requested record(s) on Merrill Lextranet.

1. Mr. Christopher Hillman's CV, as requested on or about page 36 in the above referenced deposition.
2. Health and safety manual in existence from September 11<sup>th</sup>, 2001 through the end of December, 2002, as requested on or about page 138 in the above referenced deposition.

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation.

Dated: New York, New York  
February 21, 2013

GREGORY J. CANNATA & ASSOCIATES  
Plaintiffs- Liaison Counsel

By:  \_\_\_\_\_  
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